

REMARKS

Claims 1-21 are pending in the present application.

Proposed amendments were made to the drawings to show elements described in the claims and in the text of the specification, but which Examiner states were not indicated in the Figures. Therefore, Figure 3 is proposed amended as indicated on the attached sheet.

Specifically, mechanical stopping mechanisms have been added to the library, element 304.

Amendments were made to the specification to include elements described in the claims, and in the text of the specification, but which Examiner states were not indicated in the Figures.

I. 35 U.S.C. § 121

The Office Action requires a restriction to one of the following sets of claims:

- I. Claims 1-17;
- II. Claims 18-21.

Applicant respectfully traverses the restriction requirement. Applicant provisionally elects group I, species I. Group I, species I is believed to correspond to claims 1-6.

In restricting the claims, Examiner states:

Inventions I and II differ in that invention I deals with the structure of an interlock system for a media library and invention II deals with a control sequence that is not associated with any particular structure. As no structure is given for claims 18-21 a separate search is necessary therefore the restriction is proper.

Applicant respectfully submits that claim 18 does in fact recite structure. For example, claim 18 recites:

18. A method for providing a safety procedure for a media library comprising a plurality media storage cells and at least one media picker robot that moves along the media storage cells, wherein the library is contained within an enclosure having at least one access means, the method comprising:

determining if the access means in the enclosure is open;
if the access means is closed, operating the picker robot in a normal mode,
wherein the robot moves at a first specified speed; and
if the access means is open, operating the picker robot in a safe mode, wherein the
robot moves at a second specified speed that is slower than the first speed of the normal
mode.

[Emphasis added.]

The above emphasized claim language recites structure associated with the “control sequence” of claim 18. The structure includes a media library, media storage cells, a robot that moves along the cells, and an enclosure with access means. The method steps of claim 18 are described in terms of the structure. For example, the determining step recites the access means; and the operating step recites the robot.

Therefore, Applicant respectfully disagrees with the Examiner’s statement that, “...invention II deals with a control sequence that is not associated with any particular structure.” Since there is structure recited in the context of the control sequence, Applicant respectfully submits that Examiner’s reasoning for imposing the restriction does not apply, and Applicant respectfully requests that the restriction be lifted.

Further, Applicant respectfully submits that Examiner has not shown that an undue burden would result if restriction is not imposed. Since Examiner’s reasoning for imposing restriction is believed by Applicant not to apply (*i.e.*, that “no structure is given for claims 18-21”), Applicant respectfully submits that there is no undue burden on the Examiner if the claims are examined together.

II. Amendment to the Drawings

Attached hereto is a proposed amendment to Figure 3, which adds element 304 to indicate a physical barrier used to restrict movement of a robotic picker in a storage library.

III. Conclusion

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,



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